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## *Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

## **PG&E CORPORATION,**

- and -

## **PACIFIC GAS AND ELECTRIC COMPANY,**

## Debtors.

- Affects PG&E Corporation
  - Affects Pacific Gas and Electric Company
  - Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ROBB MCWILLIAMS  
IN SUPPORT OF REORGANIZED  
DEBTORS' SEVENTY-FOURTH OMNIBUS  
OBJECTION TO CLAIMS (SATISFIED  
CLAIMS)**

**Response Deadline:  
May 12, 2021, 4:00 p.m. (PT)**

#### **Hearing Information If Timely Response Made:**

Date: May 26, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Robb C. McWilliams, pursuant to section 1746 of title 28 of the United States Code, hereby  
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,  
3 information, and belief:

4 1. I am a Managing Director at the firm of AlixPartners, LLP (“**AlixPartners**”), which is  
5 an affiliate of both AlixPartners, LLC and AP Services, LLC (“**APS**”). APS was previously retained to  
6 provide interim management services to Pacific Gas and Electric Corporation and Pacific Gas and  
7 Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**,” or, as reorganized  
8 pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the  
9 “**Chapter 11 Cases**”). I submit this Declaration in support of the *Reorganized Debtors’ Seventy-Fourth*  
10 *Omnibus Objection to Claims (Satisfied Claims)* (the “**Omnibus Objection**”),<sup>1</sup> filed contemporaneously  
11 herewith.

12 2. In my current position, I am responsible for overseeing the Bankruptcy Case Management  
13 component of AlixPartners’ assignment to assist the Reorganized Debtors with various matters related  
14 to these Chapter 11 Cases. My area of responsibility includes the effort by AlixPartners, in coordination  
15 with the Reorganized Debtors, to review and assess the validity of all claims asserted against the Debtors,  
16 other than (a) Fire Claims and Subrogation Wildfire Claims and (b) providing limited support with  
17 respect to Securities Claims. I am generally familiar with the Reorganized Debtors’ day-to-day  
18 operations, financing arrangements, business affairs, and books and records. Except as otherwise  
19 indicated herein, all facts set forth in this Declaration are based upon my personal knowledge, the  
20 knowledge of other AlixPartners professionals working under and alongside me on this matter, my  
21 discussions with the Reorganized Debtors’ personnel, the Reorganized Debtors’ various other advisors  
22 and counsel, and my review of relevant documents and information prepared by the Reorganized  
23 Debtors. If called upon to testify, I would testify competently to the facts set forth in this Declaration. I  
24 am authorized to submit this declaration on behalf of the Reorganized Debtors.

25 3. The AlixPartners team under my supervision has been actively and intimately involved  
26 in the claims review and reconciliation process since shortly after the filing of these Chapter 11 Cases.

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28 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in  
the Omnibus Objection.

1 AlixPartners initially assisted the Debtors in the preparation of their bankruptcy schedules based on the  
2 Debtors' books and records. As claims were filed, AlixPartners coordinated with the Debtors the process  
3 of reconciling filed claims with the Debtors' schedules and books and records to determine the validity  
4 of filed claims based on those schedules and books and records. AlixPartners has developed and  
5 maintains a claims reconciliation database and various data management applications that are used by  
6 the Reorganized Debtors and AlixPartners to identify both valid claims as well as claims that are not  
7 valid in whole or in part and the appropriate grounds for objection to such claims. AlixPartners is now  
8 supporting, and will continue to support, the efforts of the Reorganized Debtors and their counsel to  
9 resolve disputed claims, including by formal objections as necessary.

10       4. As part of the claims review and reconciliation process described above, the AlixPartners  
11 team, working with the Reorganized Debtors' personnel and other professionals, has identified a number  
12 of filed and scheduled claims that have been fully paid—and thus completely satisfied and released—  
13 prior to the commencement of or over the course of these Chapter 11 Cases. The Omnibus Objections  
14 are directed to some of those claims—those specifically identified in Exhibit 1 to the Omnibus  
15 Objection, in the column headed “Claim/Schedule To Be Disallowed and Expunged,” and referred to in  
16 the Omnibus Objections as “Satisfied Claims.” Exhibit 1 to the Omnibus Objection was prepared by  
17 the AlixPartners team under my overall supervision, and I am familiar with both documents, their  
18 contents, and the process under which they were prepared.

19       5. Exhibit 1 to the Omnibus Objection also identifies in the “Basis for Objection” that the  
20 Satisfied Claims are classified as:

- 21           a. “Cure Payments,” referring to Claims paid in their entirety as a cure as part of the  
22 assumption of an executory contract or unexpired leased that was assumed during  
23 the bankruptcy proceeding or on the Effective Date pursuant to the Plan and  
24 Confirmation Order.
- 25           b. “Election Generation Interconnection Claims” based on prepetition refund  
26 obligations asserted under the Debtors’ Electric Generation Interconnection  
27 program (“EGI”). EGI refunds were paid by the Debtors pursuant to Order  
28 Granting Stipulation Between the Debtors and Ad Hoc Group of Interconnection

1                   Customers to Permit Payment of Certain Pass-Through Amounts [Docket No.  
2                   4790] (the “**Interconnection Stipulation Order**”). Each Claimant retains its non-  
3                   bankruptcy remedies with respect to post-petition claims under EGI.

- 4                   c. “Engineering Advances and Other Refunds,” based on prepetition refund  
5                   obligations asserted under the Debtors’ customer programs, include engineering  
6                   advances when Customers apply for new line extension or relocation projects,  
7                   which are applied to the cost of the project (the “**Engineering Advances**”), and  
8                   various other small refund programs (the “**Engineering Advances and Other**  
9                   **Refunds**”). These refunds were paid by the Debtors pursuant to the *Final Order*  
10                  *Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507(a)(7) and Fed. R. Bankr. P. 6003*  
11                  *and 6004 (I) Authorizing Debtors to (A) Maintain and Administer Customer*  
12                  *Programs, Including Public Purpose Programs, and (B) Honor Any Prepetition*  
13                  *Obligations Relating Thereto; and (II) Authorizing Financial Institutions to Honor*  
14                  *and Process Related Checks and Transfer* [Docket No. 843].
- 15                  d. “Other Satisfied,” referring to claims that have otherwise been satisfied prior to or  
16                  during the pendency of these Chapter 11 Cases, in some cases by payments  
17                  pursuant to an order granting one of the Debtors’ first day motions.

18                  6. Based on AlixPartners’ review of the Reorganized Debtors’ books and records and my  
19                  team’s consultations with the Reorganized Debtors’ personnel, each of the Satisfied Claims identified  
20                  on Exhibit 1 to the Omnibus Objection has been satisfied prior to or over the course of the Chapter 11  
21                  Cases.

22                  Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
23                  correct to the best of my knowledge, information, and belief. Executed this fifteenth day of April, 2021.

24  
25                  \_\_\_\_\_  
26                  \_\_\_\_\_  
27                  \_\_\_\_\_  
28  
                        /s/ Robb McWilliams  
                        Robb McWilliams